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15 Attorney for Defendant
16 ROGELIO REAL

17 IN THE UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA

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United States vs. Alvarez, CR. 14-120-EMC
Stipulation to Continue Sentencing; Proposed Order

1 UNITED STATES OF AMERICA,

CASE NO. 14-120-EMC

2 Plaintiff,

3 vs.

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5 JUAN CARLOS GARCIA-GOMEZ,
6 JAIRO HERNANDEZ and ROGELIO
REAL

AMENDED STIPULATION AND
PROPOSED ORDER TO CONTINUE
SENTENCING

7 Defendants

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10 Defendants Juan Carlos Garcia-Gomez, by and through his counsel of record
11 Randy Sue Pollock, Jairo Hernandez, by and through his counsel Martin Sabelli, Rogelio
12 Real, by and through his counsel Erin Crane and Assistant United States Attorney
13 Andrew Scoble hereby request that sentencing that is presently set for September 27,
14 2017 at 9 a.m. be continued.

15 Defense counsel for Mr. Garcia Gomez just received approximately six inches of
16 medical records regarding his kidney ailment which must be reviewed and incorporated
17 into the presentence report. Also, Mr. Garcia Gomez is scheduled to see a kidney
18 specialist at Highland Hospital in either October or November. A continuance is
19 necessary to make sure that the presentence report includes the relevant information of
20 Mr. Garcia Gomez's medical condition and future medical needs. Also, the results of his
21 upcoming medical appointment at Highland need to be part of the presentence report
22 since the Bureau of Prisons will be making a medical designation for him.

23 United States Probation Officers Monica Romero and Jill Polish Spitalieri have no
24 objection to this request.

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28 *United States vs. Alvarez, CR. 14-120-EMC*
Stipulation to Continue Sentencing; Proposed Order

1 This continuance on behalf of the three defendants is requested given the package
2 deal part of the plea agreements for each defendant.

3 Due to the calendars of the respective defense counsel, it is requested that
4 sentencing for Rogelio Real and Juan Carlos Garcia Gomez be continued to December
5 12, 2017 at 10 a.m. and that sentencing for Jairo Hernandez be continued to December
6 19, 2017 at 10 a.m.

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8 Date: September 14, 2017

Respectfully submitted,

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10 /s/
11 RANDY SUE POLLOCK
Counsel for Defendant
Juan Carlos Garcia Gomez

12 Date: September 14, 2017

13 /s/
14 MARTIN SABELLI
Counsel for Defendant
Jairo Hernandez

15 Date: September 14, 2017

16 /s/
17 ERIN CRANE
Counsel for Defendant
Rogelio Real

18 Date: September 14, 2017

19 /s/
20 ANDREW SCOBLE
Assistant United States Attorney

21 **PURSUANT TO STIPULATION IT IS SO ORDERED:**

22 Date: September 15, 2017



23
24 *United States vs. Alvarez, CR. 14-120-EMC*
25 *Amended Stipulation and Proposed Order To Continue Sentencing*